

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In the Matter of the Arbitration
Between:

NORTH STAR REINSURANCE CORPORATION,

Petitioner,

-against-

HAREL INSURANCE COMPANY f/k/a ZION
INSURANCE COMPANY LIMITED,

Respondent.

:
: Docket No. _____
:
:
:
: NOTICE OF MOTION FOR
: LEAVE TO FILE UNDER
: SEAL CONFIDENTIAL
: EXHIBITS TO THE
: DECLARATION OF JOSEPH
: J. SCHIAVONE IN
: SUPPORT OF NORTH
: STAR'S PETITION TO
: CONFIRM ARBITRATION
: AWARD

TO: CLERK OF THE COURT
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

PLEASE TAKE NOTICE that Petitioner North Star Reinsurance Corporation ("North Star") hereby moves before the United States District Court for the Southern District of New York for an Order authorizing North Star to file under seal Exhibit A, Exhibit B and Exhibit D to the Declaration of Joseph J. Schiavone in Support of North Star's Petition to Confirm and Motion to Seal ("Schiavone Declaration")¹. North Star's motion is made on the ground that good cause exists for sealing

¹ Copies of Exhibits A, B and D to the Schiavone Declaration were confidentially lodged with the Court in conjunction with the filing of the Petition to Confirm.

Exhibits A, B and D because the documents contain non-public, confidential information and public disclosure of the documents would create a substantial risk of direct and serious injury to North Star.

In support of this motion, Petitioner relies on the attached Declaration of Joseph J. Schiavone dated March 5, 2008, Declaration of Robert Edgeworth, dated February 15, 2008 and the accompanying Memorandum of Law.

Respectfully submitted,

BUDD LARNER, P.C.
11 Penn Plaza - 5th Fl.
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-and-

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Short Hills, New Jersey 07078
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Attorneys for Petitioner
North Star Reinsurance
Corporation

BY: 
JOSEPH J. SCHIAVONE (JS 7303)

Dated: March 5, 2008
Short Hills, New Jersey